

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

ASSENTED TO MOTION OF PLAINTIFF RHONDA HALL
FOR AN EXTENSION OF TIME TO FILE OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

The Plaintiff respectfully moves this Court for an extension of time until Tuesday, October 10, 2006 to file her opposition to the Defendant's pending motion for summary judgment, and to correspondingly extend the time for the filing of a reply by the Defendants until October 17, 2006. As grounds for this motion, Plaintiff states:

1. The Defendant has filed a motion for summary judgment on the Plaintiff's claims raised in her complaint.
2. The Plaintiff's opposition to the Defendant's motion for summary judgment is presently due on October 2, 2006.
3. Since being served with Defendants' Motion for Summary Judgment, an intervening vacation and particularly pressing scheduling demands have interfered with Plaintiff's counsel's ability to complete the Plaintiff's opposition without the requested extension.

4. Immediately after being served with the Defendants' motion for summary judgment, Plaintiff's counsel was out of the country on vacation with his family for two weeks.

5. Since returning from vacation on September 5, 2006, Plaintiff's counsel has experienced particularly heavy scheduling demands, including preparation for two previously scheduled trials and three back-to-back mediations.

6. Plaintiff's counsel has been advised by Stacy Smith Walsh, counsel for the Defendants, that she assents to the extension sought in this motion.

Respectfully submitted,

PLAINTIFF RHONDA HALL
By her Attorney,

Dated: October 2, 2006

/s/ Hugh D. Heisler
Hugh D. Heisler, Esq.
BBO # 563925
Heisler, Feldman, McCormick &
Garrow, P.C.
1145 Main Street, Suite 508
Springfield, MA 01103
(413) 788-7988

Assented to:

/s/ Stacy Smith Walsh
Stacy Smith Walsh, Esq.

CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that true copies of the foregoing Motion were electronically served upon the attorney of record for the Defendants on October 2, 2006.

/s/ Hugh D. Heisler
Hugh D. Heisler